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January 10, 2022

VIA ECF

Hon. Loretta A. Preska
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Ideavillage Products Corp. v. 001xiaopuzi, et al.*
Civil Case No. 19-cv-9160
Proposed Discovery Schedule

Dear Judge Preska,

We represent Plaintiff Ideavillage Products Corp. (“Plaintiff” or “Ideavillage”) in the above-referenced action.¹ In accordance with the directives of the Court’s December 21, 2021 Order (Dkt. 62), together with Defendant Venus Rainbows, the parties have agreed on a proposed discovery schedule.

The parties have agreed to complete discovery as follows:

- The parties’ deadline to serve written discovery demands is **February 21, 2022**;
- The parties are to respond to the written discovery demands by **March 21, 2022**;
- Depositions are to be completed by **April 25, 2022**; and
- Expert discovery (if any) is to be completed by **May 25, 2022**.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

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¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary.